



ADECA's EMERGENCY SOLUTIONS GRANTS PROGRAM

COMPLIANCE WORKSHOP FOR
PY2015 HESG SUBRECIPIENTS
DECEMBER 2, 2015

ADECA's ESG WEB PAGE

- www.adeca.alabama.gov
- Scroll over “Divisions” (top right)
- Click “Community and Economic Development”
- Click “Community Development Programs” (left)
- Click “Emergency Solutions Grant”

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LETTER OF AWARD DOCUMENTS

- Budget Forms
- List of Second-tier Subrecipients
- Subrecipient Administration
- Certification Form
- W-9 Form
- Program Correspondence
- Environmental Forms

LETTER OF AWARD DOCUMENTS

- State of Alabama Disclosure Statement Form
- Copy of deeds, mortgages, and appraisals
- Certification of Local Government Approval
- Certification of building use
- Schedule of activities



LETTER OF AWARD DOCUMENTS

- Certificate of Compliance with the Beason-Hammon Act
- Copy of E-Verify Memorandum of Understanding
- Certification of Compliance with the Transparency Act Requirements
- Certifications by the Chief Elected Official (Chief Executive Officer) or the Authorized Official

E-VERIFY (for nonprofit Subrecipients only)

- Must be enrolled in the E-Verify program maintained by the U.S. Dept. of Homeland Security, **only required if agency has one or more paid employees – submit MOU**
- Enrollment is available at (<http://immigration.alabama.gov>)

POLICIES & PROCEDURES

- Eligibility
- Coordination of services
- Prioritizing prevention and re-housing assistance
- Length of time assistance will be provided
- Program participants' share in costs

POLICIES & PROCEDURES

- Type, amount, and duration of housing stabilization and relocation services to be provided
- Targeting/providing essential services related to street outreach

POLICIES & PROCEDURES

- Admission, diversion, referral, and discharge by emergency shelters assisted under ESG
 - Length of stay
 - Safety and shelter needs of special populations
 - Persons/families with the highest barriers to housing and are likely to be homeless the longest

POLICIES & PROCEDURES

- Assessing, prioritizing, and reassessing program participants' needs for essential services related to emergency shelter
- Terminating assistance
- Access to the ESG program for persons of limited English proficiency

PROCUREMENT

- Small purchase procedures
- Competitive negotiation (RFP)
- Competitive sealed bids
 - May utilize ADECA's Office of Minority Business Enterprise
- Sole source procurement

FINANCIAL

Supporting documentation should include:

- Expenditures to be reimbursed
- Expenditures paid/value of services provided as match
- Program income (returned deposits)
- Invoice Documentation Cover Sheets
- Prevention/Re-housing Documentation Checklist

INVOICES

- Submit invoices monthly
- Address on invoice, Certification Form, and in STAARS Vendor Payment System must be identical
- Signature on invoice and Certification Form must be identical
- Signature on budget and Certification Form must be identical

MATCH

- Can be obtained from any local, state, federal, or private source, except ESG
- Other program regulations must not prohibit those funds from being used as match for ESG
- If ESG is being used for match for another program, funding from that program cannot be used as match for ESG

MATCH

- Must be provided after date of grant agreement
- Cash contributions must be expended within the expenditure deadline
- Noncash contributions must be made within the expenditure deadline

MATCH

- Funds used to match another program cannot be used as match for ESG
- Services provided by individuals are valued at rates consistent with those ordinarily paid for similar work in the organization or by other local employers
- Do not use rates published by Independent Sector; use the minimum wage if there are no similar rates
- Document special rates for noncash contributions

INDIRECT COSTS

- Please contact ADECA for guidance before billing for indirect costs
- Must have an indirect cost rate proposal developed in accordance with OMB Guidance for Grants and Agreements
- Must submit copy of proposal to ADECA

INDIRECT COSTS

Indirect costs charged to an activity with an expenditure limit:

Indirect Costs + Direct Costs = Total Costs

Total Costs are then compared to the Expenditure Limit

CENTRALIZED/COORDINATED ASSESSMENT SYSTEM (CAS)

- To be developed by the local CoC
- Once developed, must be used by each ESG subrecipient and/or second-tier subrecipient
- Should decrease wait time to receive ESG assistance
- Case managers should be knowledgeable of all local service providers even if they aren't a part of the CAS



EMERGENCY SHELTER STANDARDS

- Building is structurally sound
- Energy Star and WaterSense products and appliances (for rehab or conversion projects)
- Accessibility
- Adequate space and security
- Interior air quality
- Water supply

EMERGENCY SHELTER STANDARDS

- Sanitary facilities
- Thermal environment
- Illumination and electricity
- Food preparation
- Sanitary conditions
- Fire safety

HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

Participants must be assisted, as needed, in obtaining:

- Appropriate supportive services such as medical/mental health treatment or services essential for independent living
- Mainstream benefits like Medicaid, SSI, or TANF

CASE MANAGEMENT

- Prevention and re-housing program participants are required to meet with their case managers monthly while receiving assistance (unless prohibited by laws regarding domestic violence issues)
- Case manager must develop a housing stability plan to assist participants in retaining permanent housing after assistance ends

RENTAL ASSISTANCE

- **Only tenant-based rental assistance is eligible** (participant selects housing)
- Rent can't exceed the Fair Market Rent
- Rent must comply with HUD's Rent Reasonableness Standards
- Unit must comply with Minimum Habitability Standards & Lead-Based Paint Regulations
- ESG funds cannot be used to pay late fees generated after person enters program

RENTAL ASSISTANCE

- Mortgage payments are ineligible
- Requires a legally-binding, written lease between the owner and participant (except for arrears only)
- Agencies providing assistance must enter into a rental assistance agreement with the landlord/owner to whom rental payments will be made

RENTAL ASSISTANCE AGREEMENT

- Set forth terms under which rental assistance will be provided (*includes requirements at § 576.106*)
- Must contain same due date, grace period, and penalty requirements as participant's lease
- Must state that tenant-based rental assistance will be provided

RENTAL ASSISTANCE AGREEMENT

During term of agreement:

- Owner of housing must give agency a copy of any notice provided to the participant to vacate the housing unit
- Owner of housing must give agency a copy of any complaint used under state or local law to commence an eviction action against the participant

RENTAL ASSISTANCE

- The total period for which any program participant may receive services must not exceed 24 months during any 3-year period.
- Cannot Use with Other Subsidies
- Rental assistance cannot be provided to a household receiving rental assistance from another public source for the same time period (except 6 months of arrears).

Persons in public housing units or using housing choice vouchers cannot receive monthly rental assistance under ESG.

PARTICIPANT FILE DOCUMENTATION

- Entry in and exit from HMIS/Comparable Database
- Eligibility (housing status and income)
- Lack of resources, support networks, and alternate housing
- Case Management Notes
- Documentation that the same type of assistance is not being provided by other public sources
- Housing Stability Plan

PARTICIPANT FILE DOCUMENTATION

- Type/amount of assistance provided
- Lease
- Rental Assistance Agreement
- Rent Reasonableness Checklist
- Compliance with Fair Market Rent
- Housing Habitability Standards Checklist
- Lead-Based Paint Checklist
- Form documenting participant is aware of the termination/grievance policy

PARTICIPANT ELIGIBILITY

Homelessness Prevention

- Conduct initial evaluation
- Meet criteria of “at-risk of homelessness,” categories 1, 2, and 3 **or** criteria of homeless definition categories 2, 3, or 4
- Annual income below 30% of AMI at program entry
- Lacks support networks and financial resources to remain in housing
- Re-evaluation at least once every 3 months

PARTICIPANT ELIGIBILITY

Rapid Re-Housing

- Conduct initial evaluation
- Meet criteria of category I of homeless definition final rule
- No income threshold at program entry
- Lacks support networks and financial resources to obtain housing
- Re-evaluation annually

ELIGIBILITY

For both Prevention and Re-housing

At re-evaluation:

1. Annual income at or below 30% AMI
2. Lacks support networks and sufficient resources to retain housing without ESG assistance
3. Annual income is calculated based on guidelines found at 24 CFR 5.609 (**for initial assessment and re-evaluation**)
4. Participants should report changes in income or circumstances that affect their need for ESG assistance



HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

The regulations establish the following order of priority for obtaining evidence:

1. Third-party documentation, including written and source documentation, and HMIS records;
2. Intake worker observations; and
3. Certification from persons seeking assistance

RAPID RE-HOUSING

- Rapid Re-housing is a model for helping people move from the streets or shelter to permanent housing - it was not intended for people exiting transitional housing (TH).
- **Using rapid re-housing funds to exit persons from TH should not be common practice or a core aspect of your program design.**



HOMELESS PARTICIPATION

To the maximum extent possible, involve homeless persons/families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG.

RECORDKEEPING, REPORTING, AND CLOSEOUT

- Maintain records for 5 years after project closeout
- For renovation/conversion, maintain records for 10 years after closeout
- Annual CAPER (due by April 30th)
- Closeout
 - Conditions of Project Closeout Form
 - Subrecipient Budget/Final Financial Report
 - Cumulative CAPER